

REMARKS

Claims 1, 3-9 and 11-16 are pending in this application. By this Amendment, claims 1 and 9 are amended. These amendments are supported by Applicants' specification at least at, page 5, lines 13 - page 6, line 23, page 13, lines 1-6 and Figs. 1-3. No new matter is added. A Request for Continued Examination is attached. Reconsideration of the application based on the above amendments and the following remarks is respectfully requested.

The Office Action rejects claims 1, 3-9 and 11-16 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 7,107,620 to Haverinen et al. (hereinafter "Haverinen"). This rejection is respectfully traversed.

Without conceding the appropriateness of the rejection, and solely to advance prosecution of this application, claims 1 and 9 are amended. Haverinen does not teach the combinations of the features recited in these claims for at least the following reasons.

Claims 1 and 9 recite, among other features, the SIM-RADIUS module and SIM gateway module are located on an open network and have direct access to a plurality of GSM networks on the open network for authentication at an HLR or a VLR of each of the plurality of GSM networks.

Haverinen teaches, at, *e.g.*, col. 20, line 42 - col. 21, line 4, a PAC and a GAGW for authentication of an MT. Specifically, Haverinen teaches, at, *e.g.*, col. 20, line 61 - col. 21, line 4, "Typically, a single GAGW supports several PACs simultaneously. The GAGW identifies various PACs by using their IP addresses. In this interface, the MT identification is based on an IMSI code stored on the SIM_B. The GAGW-HLR interface is implementation and vendor specific. The GAGW hides the cellular infrastructure from PACs. Therefore, the PAC-GAGW interface is always the same although the underlying cellular network may be of a different type (GSM, GPRS) or provided by a different vendor." Thus, Haverinen teaches a single GAGW supporting several PACs. Haverinen does not teach a single PAC supporting

several GAGWs. Further, Haverinen teaches the GAGW identifying various PACs by using their IP addresses. Haverinen does not teach the PAC identifying various GAGWs by using their IP addresses. Haverinen teaches the GAGW being implementation vendor specific. Haverinen does not teach that a GAGW has access to a plurality of GSM networks on an open network. Thus, Haverinen cannot reasonably be considered to teach the SIM-RADIUS module and SIM gateway module have direct access to a plurality of GSM networks on the open network for authentication at an HLR or a VLR of each of the plurality of GSM networks, as recited in claims 1 and 9. Haverinen does not teach a PAC performing an authentication of a mobile IP node directly via an open network at an HLR or a VLR. Haverinen teaches authentication via the GAGW. Haverinen does not teach a GAGW performing an authentication of a mobile IP node directly via the open network at an HLR or a VLR. Haverinen teaches authentication the GAGW authenticating via the GSM network.

Claims 1 and 9 recite, among other features, based on the IMSI, a logical IP data channel of the WLAN is user-specifically supplemented towards corresponding GSM data for signal and data channels of one of the plurality GSM networks. Haverinen teaches, at, *e.g.*, col. 22, lines 9-13, "[i]f the PAC receives a positive acknowledge message ACK confirming successful authentication, it completes the authentication by opening the access to the Internet. If the PAC receives a negative acknowledge message NACK, it refuses to open access to the Internet." Thus, Haverinen teaches opening the access to the Internet. Haverinen does not teach a logical IP data channel of the WLAN is user-specifically supplemented towards corresponding GSM data for data channels.

For at least the foregoing reasons, Haverinen cannot reasonably be considered to teach the combinations of all of the features positively recited in claims 1 and 9. Further, Haverinen cannot reasonably be considered to teach, the combinations of all of the features

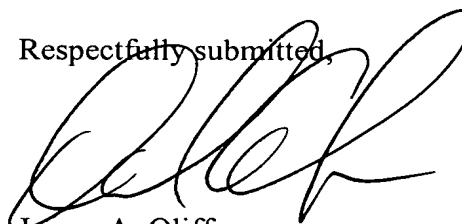
recited in claims 3-8 and 11-16 for at least the dependence of these claims on allowable base claims, as well as for the separately patentable subject matter that each of these claims recites.

Accordingly, reconsideration and withdrawal of the rejection of claims 1, 3-9 and 11-16 under 35 U.S.C. 102(e) as being anticipated by Haverinen are respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1, 3-9 and 11-16 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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Attachment:
Request for Continued Examination

Date: February 5, 2009

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